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February 6, 2006

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Federal Communications Commission
Office of Secretary

BY HAND DELIVERY

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: EB Docket No. 06-36 / EB-06-TC-060: Certification of CPNI Filing
February 3, 2006

Dear Ms. Dortch:

Network Telephone Corporation, through counsel, respectfully submits the enclosed Customer Proprietary Network Information Certification for filing in EB Docket No. 06-36 and EB-06-TC-060. If you have any questions regarding this filing, please contact the undersigned at (202) 887-1234.

Sincerely,



Jennifer M. Kashatus

Enclosure

cc: Byron McCoy, Telecommunications Consumers Division,
Enforcement Bureau, FCC

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2005 Customer Proprietary Network Information Certification

I, Aloysius T. Lawn IV, EVP-General Counsel and Secretary of Network Telephone Corporation have firsthand knowledge of the procedures that Network Telephone Corporation has implemented to comply with the Federal Communications Commission's rules pertaining to safeguarding customer proprietary network information ("CPNI"). I certify that Network Telephone Corporation has established procedures that are adequate to comply with the Commission's CPNI rules set forth in section 64.2001 et seq. I relied on Attachment A in making this certification.

Aloysius T. Lawn IV
Signature

EVP – General Counsel and Secretary
Title

2/3/06
Date

2005 Customer Proprietary Network Information Certification
Attachment A

Network Telephone Corporation has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules pertaining to the use, disclosure, and access to customer proprietary network information ("CPNI") set forth in section 64.2001 et seq. Network Telephone Corporation has trained its personnel in the appropriate use of CPNI. Network Telephone Corporation's handbook summarizes the appropriate use of CPNI and the disciplinary process in place for failure to use CPNI in accordance with Network Telephone Corporation's policy.

In accordance with Network Telephone Corporation's policy, Network Telephone Corporation does not use CPNI for any marketing purpose other than to market services to customers within the same category of service to which they already subscribe. For example, Network Telephone Corporation may contact the customer regarding extending the length of the customer's contract with Network Telephone Corporation. Network Telephone Corporation also may use CPNI as required to render services and to bill for such services. Network Telephone Corporation does not share CPNI with affiliates or third parties.